ROBERT A. EDER, JR. (# 8056) Attorney for the Debtor(s) 5667 S. Redwood Road, Suite 8 Salt Lake City, Utah 84123 Telephone (801) 265-1836 Facsimile (801) 265-1866 rob@ederlaw.net

## IN THE UNITED STATES BANKRUPTCY COURT DISTRICT OF UTAH

IN RE:

DAVID M. McKAY and SHALECE McKAY,

Bankruptcy Case No. 11-35951 WTT

Chapter 13

Debtor(s).

NOTICE OF DEBTORS' MOTION TO AUTHORIZE SALE OF REAL PROPERTY, REDUCE CLAIM NO. 12 IN FAVOR OF BANK OF CAMDEN TO ZERO, AUTHORIZE EMPLOYMENT OF REAL ESTATE AGENT, AND AWARD ATTORNEY'S FEES, AND NOTICE OF OPPORTUNITY FOR HEARING

(Objection Deadline: April 20, 2015)

Debtors David M. McKay and Shalece McKay filed with the United States Bankruptcy Court for the District of Utah, a Motion to Authorize Sale of Real Property, Reduce Claim No. 12 in Favor of Bank of Camden to Zero, Authorize Employment of Real Estate Agent, and Award Attorney's Fees.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Debtors' Motion seeks an order from the Court authorizing Debtors to sell their home, reducing Claim No. 12 in favor of Bank of Camden to zero, authorizing employment of a real estate agent, and awarding attorney's fees in an amount up to \$1,000.00.

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE COURT ON OR BEFORE THE OBJECTION DEADLINE SET FORTH BELOW.

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion then you or your attorney must:

(1) on or before **April 20, 2015**, file with the Bankruptcy Court a written response to the motion, explaining your position, at:

U.S. Bankruptcy Court Clerk 350 S. Main Street, Room 301 Salt Lake City, UT 84101

If you mail your response to the court for filing, you must mail it early enough so that the court will **receive** it on or before the date stated above. You must also mail a copy to the undersigned counsel at the following address: Robert A. Eder, Jr., 5667 S. Redwood Road, Suite 8, Salt Lake City, Utah 84123.

(2) attend a hearing on April 27, 2015 at 10:00 A.M. in Room 376, United States

Courthouse, 350 S. Main Street, Salt Lake City, Utah. There will be no further notice of
the hearing and failure to attend the hearing will be deemed a waiver of your objection.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and the Court may enter an order granting that relief. In

the absence of a timely filed objection, the undersigned counsel may and will ask the Court to enter an order approving the Motion without a hearing.

DATED April 2, 2015.

/S/ Robert A. Eder Jr.
Robert A. Eder Jr.
Attorney for the Debtor(s)

## **CERTIFICATE OF SERVICE**

I Hereby Certify that on April 2, 2015, I sent by ECF or by U.S. Mail Postage Pre-Paid, a true and correct copy of Motion to Authorize Sale of Real Property, Reduce Claim No. 12 in Favor of Bank of Camden to Zero, Authorize Employment of Real Estate Agent, and Award Attorney's Fees, and the above Notice of Opportunity for Hearing to all parties on the attached mailing matrix:

/S/ Lindsi Helt
Lindsi Helt, Paralegal

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Label Matrix for local noticing 1088-2 Case 11-35951 District of Utah Salt Lake City Thu Apr 2 10:08:44 MDT 2015

Acqura Loan Services 7880 Bent Branch Dr. Ste. 150

Irving, TX 75063-6045

American Fork Hospital 4646 Lake Park Blvd. Salt Lake City, UT 84120-8212

Kevin R. Anderson tr 405 South Main Street Suite 600 Salt Lake City, UT 84111-3408

Central Bank 75 N. University Ave. Provo, UT 84601-4429

Checknet PO Box 150 Provo, UT 84603-0150

Comcast Cable c/o Federal Bond and Collection P.O. Box 34744 Seattle, WA 98124-1744

Covington Capital Corporation 954 East North Union Ave. Ste. 1 B102 Midvale, UT 84047-1785

E Partner Net 746 E 1910 S Ste 4 Provo, UT 84606-6244

Express Recovery Services 2790 Decker Lake Dr. Salt Lake City, UT 84119-2057 AMC Mortgage Services 1100 Town and Country Rd. 1200 Orange, CA 92868-4693

Acqura Loan Services Attn: Payment Processing PO Box 202743 Dallas, TX 75320-2743

American Fork Hospital c/o IHC Health Services 3930 W. Parkway Blvd. Salt Lake City, UT 84120-6300

Bank of Camden 430 Montbrook Lane STE 207-208 Knoxville, TN 37919-2705

Central Bank PO Box 1488 Provo, UT 84603-1488

Citifinancial Mortgage PO Box 9438 Gaithersburg, MD 20898-9438

Cory Adams Photography c/o Bonneville Collections 2627 Washington Blvd. Ogden, UT 84401-3613

Customized Auto Credit PO Box 310 Gb Br W916 Barrington, IL 60011-0310

EPN Inc. 746 East 1910 South Provo, UT 84606-6223

Express Recovery Services, Inc. P.O. Box 26415 Salt Lake City UT 84126-0415 Aarons Sales & Lease Ownership 1015 Cobb Place Blvd NW Kennesaw, GA 30144-3672

Afni, Inc. PO Box 3667

Bloomington, IL 61702-3667

Ameriquest Mortgage 2677 North Main St. Suite 140

Santa Ana, CA 92705-6659

Bonneville Billing 1186 East 4600 South Suite 100 Ogden, UT 84403-4896

Check City 159 S. 500 E. American Fork, UT 84003-2656

Citimortgage PO Box6243 Sioux Falls, SD 57117-6243

Covington Capital Co. 954 E. North Union Ave. Midvale, UT 84047-1785

Douglas D. Yates 1420 East 2000 North Lehi, UT 84043-2748

Robert A. Eder Jr. 5667 S. Redwood Road Suite 8 Salt Lake City, UT 84123-5433

HSBC Bank PO Box 98706 Las Vegas, NV 89193-8706

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Intermountain Health Care, Inc. P.O. Box 27808 Salt Lake City UT 84127-0808 (p) INTERNAL REVENUE SERVICE CENTRALIZED INSOLVENCY OPERATIONS PO BOX 7346 PHILADELPHIA PA 19101-7346 Karen-Kelly Braem Ryan Bolander PO Box 17210 Golden, CO 80402-6020

Knight Adjustment Bureau 404 E. 4500 S. ,#34 Salt Lake City, UT 84107-2710 Law Offices of Quinn M. Kofford 43 North 470 West American Fork, UT 84003-2267 Lawyers Partner Net 746 East 1910 South Suite 3 Provo, UT 84606-6225

Lehi Jr. High School c/o Lawyers Partner Net 1875 S. State Ste. T100 Orem. UT 84097-8099 Liberty Acquisitions LLC PO Box 17210 Golden, CO 80402-6020

Matco Tools 4403 Allen Rd Stow, OH 44224-1096

David M. McKay 450 North 400 East Lehi, UT 84043-1937 Shalece McKay 450 North 400 East Lehi, UT 84043-1937 Michael Whiting c/o Express Recovery Services 2790 Decker Lake Dr. Salt Lake City, UT 84119-2057

Mountain America Credit Union 735 SOUTH STATE STREET #300 SALT LAKE CITY, UTAH 84111-3821 Mountain America Credit Union PO Box 90001 West Jordan, UT 84084 Mountain Land Collections Inc. PO Box 1280 American Fork, UT 84003-6280

NCEP LLC 3715 Davinci CT Ste. 200 Norcross, GA 30092-2670 NCEP LLC assignee of HSBC CARD SERVICES (III c/o Becket and Lee LLP POB 3001 Malvern PA 19355-0701

NCEP, LLC 2877 Paradise Rd. Unit 303 Las Vegas, NV 89109-5239

National Credit Adjustment 327 West 4th Ave. Hutchinson, KS 67501-4842 (p) NATIONSTAR MORTGAGE PO BOX 630267 IRVING TEXAS 75063-0116 Outsource Receivables PO Box 166 Ogden, UT 84402-0166

Outsource Receivables Management 3017 Taylor Ave. Ogden, UT 84403-0913 R. C. Willey Financial Services P.O.Box 65320 Salt Lake City, Utah 84165-0320 RC Willey 2301 South 300 West Salt Lake City, UT 84115-2516

Raincheck 116 West Main St. American Fork, UT 84003-2320 Tri City Medical c/o Mountain Land Collections PO Box 1280 American Fork, UT 84003-6280 United States Trustee Ken Garff Bldg. 405 South Main Street Suite 300 Salt Lake City, UT 84111-3402

Utah County Treasurer 100 East Center, Suite 2400 Provo, UT 84606-3106 Utah State Tax Commission Attn: Bankruptcy Unit 210 North 1950 West Salt Lake City, UT 84134-3340 Wells Fargo Bank PO Box 6995 Portland, OR 97228-6995 Case 11-35951 Doc 68

Document

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William F. Adamson 233 South Pleasant Grove Blvd. Suite 204 Pleasant Grove, UT 84062-2878

Kent O. Willis 476 South 560 East Orem, UT 84097-6443

Workforce Services 5735 S. Redwood Road Taylorsville, UT 84123-5230

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service Centralized Insolvency Operations PO Box 21126 Philadelphia, PA 19114-0326

Nationstar Mortgage Bankruptcy Department 350 Highland Dr. Lewisville, TX 75067-4177

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) Cory Adams Photography c/o Bonneville Collections 2627 Washington Blvd. Ogden, UT 84401-3613

(d) RC Willey 2301 South 300 West Salt Lake City, UT 84115-2516

(d) Utah County Treasurer 100 East Center, Suite 2400 Provo, UT 84606-3159

End of Label Matrix Mailable recipients 62 Bypassed recipients 3 Total 65